

UNITED STATES DISTRICT COURT
for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

September 18, 2022

United States of America

v.

Alejandro TORREZ

YOB: 1983

USC

) Case No. 7:22-mj-1845-1

Nathan Ochsner, Clerk of Court

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)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 16, 2022 in the county of Starr in the
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 USC 841	Possession with Intent to distribute approximately 203 kilograms of marijuana, a schedule I controlled substance.
21 USC 846	Conspiracy to possess with intent to distribute approximately 203 kilograms of marijuana, a schedule I controlled substance.

This criminal complaint is based on these facts:

SEE ATTACHMENT A

Continued on the attached sheet.

Complaint authorized by AUSA Jongwoo Chung

/s/ Juan Tapia

Complainant's signature

Juan Tapia, DEA Task Force Officer

Printed name and title

Submitted by reliable electronic means, sworn and attested to telephonically pursuant to Fed. R. Crim. P. 4.1 and probable cause found on:

Date: September 18, 2022 at 8:31 a.m.

City and state: McAllen, Texas

J. Scott Hacker, U.S. Magistrate Judge

Printed name and title

Attachment A

1. On September 16, 2022, Border Patrol (BP) Agents operating in La Grulla, Texas, observed two vehicles, including a silver Ford Expedition, travel to and park near the riverbank of the Rio Grande River.
2. BP Agents observed what appeared to be bundles of suspected narcotics being prepared for importation into the United States from Mexico in the area where the vehicles were parked. BP Agents then observed the silver Ford Expedition traveling at a high rate of speed northbound from the river.
3. BP Agents attempted to pull over the silver Ford Expedition, but the vehicle failed to yield. A brief vehicle pursuit ensued. The silver Ford Expedition eventually stopped but the driver, later identified as Alejandro TORREZ, fled from the vehicle. After a brief foot pursuit, BP Agents apprehended TORREZ.
4. During a search of the silver Ford Expedition, BP Agents located 49 bundles of suspected marijuana in the silver Ford Expedition. The suspected marijuana weighed approximately 203 kilograms.
5. During a post Miranda interview, TORREZ admitted that he knowingly worked with other individuals to transport the marijuana in exchange for \$4,000 US currency.